

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

2013 JUL 12 PM 3:06

Elizabeth Ruth Dabney

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. _____

United States Postal Service

(Name of defendant or defendants)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, _____

Elizabeth Dabney
(name of plaintiff)

is a citizen of the United States and resides at _____

6517 Bald Cypress Cove
(street address)

Memphis
(city)

Tennessee
(country)

TN
(state)

38141-7881
(zip code)

901-515-1911
(telephone number)

3. Defendant United States Postal Service
(defendant's name)
 lives at, or its business is located at 131 Center Street
Collierville, TN 38017-9998
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at
131 Center Street
Collierville (city) TN (state) 38017-9998 (zip code)
(street address)

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 29th October 2011
(day) (month) (year)

6. Defendant filed charges against the defendant with the ^{merit system protection Board} Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about March 2012
(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 23 May 2012
(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 16 May 2013. (Attach a copy of the notice to this complaint.)
(day) (month) (year)

9. Because of plaintiff's (1) X race, (2) ___ color, (3) ___ sex, (4) ___ religion, (5) ___ national origin, defendant

- (a) ___ failed to employ plaintiff.
- (b) X terminated plaintiff's employment.
- (c) ___ failed to promote plaintiff.
- (d) ___

10. The circumstances under which defendant discriminated against plaintiff were as follows: Received a notice of Removal due to a faulty vehicle jumping out of gear causing an accident. Vehicle had been out of operation for mechanical repairs and was given back to plaintiff to drive the same day of the accident for the first time since it had been allegedly repaired.

11. The acts set forth in paragraph 9 of this complaint

- (a) X are still being committed by defendant.
(b) _____ are no longer being committed by defendant.
(c) _____ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) _____ Defendant be directed to employ plaintiff, or
(b) X Defendant be directed to re-employ plaintiff, or
(c) _____ Defendant be directed to promote plaintiff, or;
(d) _____ Defendant be directed to _____

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes X No ()

Elyse R. Habrey
SIGNATURE OF PLAINTIFF